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Attorney for Defendant
Wei Wei Liang

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND VENUE

UNITED STATES OF AMERICA)	Case No: CR09-00573SBA
)	
Plaintiff,)	STIPULATION AND ORDER
)	CONTINUING CHANGES OF PLEA
Vs.)	HEARING AND EXCLUDING TIME
)	
FANG DING et al)	
)	
)	
Defendant)	

Plaintiff, by and through its attorney of record, and defendants, by and through their attorney of record, hereby stipulate and ask the Court to find as follows:

1. A changes of plea hearing in this matter is currently scheduled for 11:00 a.m. on January 19, 2010.

2. The parties request that this hearing be continued until 11:00 a.m. on March 2, 2010. The parties are presently negotiating a resolution of the case through plea agreements. Specifically, on December 6, 2009, AUSA Andrew Huang provided counsel for all three defendants with draft plea agreements. Defense counsel and ASUA Huang then met and conferred and a revised plea agreement is being prepared

1 which the parties feel will result in a resolution of the case.

2 3. Counsel for the defendants require additional time to appropriately research,
3 investigate, and counsel their clients, including counseling on their potential defenses
4 and options in light of the ongoing plea agreement negotiations. Defense counsel
5 needs additional time to perform necessary additional investigation and preparation.

6 4. The parties agree the ends of justice served by granting the continuance
7 outweigh the best interests of the public and defendant in a speedy trial. Therefore, the
8 parties further stipulate and request that the Court exclude time between the date of this
9 Stipulation and March 2, 2010 under the Speedy Trial Act for effective preparation of
10 counsel, continuity of defense counsel, and pursuant to 18 U.S.C. §§ 3161(h)(4) and
11 (7)(B)(iv).

12
13 IT IS SO STIPULATED

14
15 Dated: January 15, 2010 /S/
16 DIANA L. WEISS
Attorney for Wei Wei Liang

17
18 Dated: January 15, 2010 /S/
EDWARD HUNG
Attorney for Bo Shen

19
20 Dated: January 15, 2010 /S/
21 JULES BONJOUR
Attorney for Fang Ping Ding

22 Dated: January 15, 2010 /S/
23 ANDREW HUANG
Assistant United States Attorney

ORDER

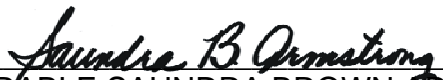
FOR GOOD CAUSE SHOWN, IT IS FOUND AND ORDERED THAT:

1. The currently scheduled January 19, 2010, changes of plea hearing is vacated. A changes of plea hearing is now set for 11:00 a.m. on March 2, 2010.

2. For the reasons stated in the parties' Stipulation, the ends of justice are served by granting the continuance outweigh the best interests of the public and defendant in a speedy trial.

3. Pursuant to 18 U.S.C. §§ 3161(h)(4) and (7)(B)(iv), the time period from the date of this Order to March 2, 2010 is excluded under the Speedy Trial Act to allow for the effective preparation of counsel, taking into account the exercise of due diligence, and continuity of defense counsel.

Dated: 1/15/10


HONORABLE SAUNDRA BROWN ARMSTRONG
UNITED STATES DISTRICT JUDGE